

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE WESTERN DIVISION

SUSAN WRIGHT)
)
Plaintiff,)
)
vs.) Civ. No. -07-2503-B/P
)
)
PROGRESSIVE DIRECT INSURANCE)
COMPANY, ET AL)
)
Defendant.)
)

**NOTICE OF FILING MEDICAL BILLS PURSUANT TO T.C.A. §24-5-113 TO
ESTABLISH PRESUMPTION OF REASONABLENESS**

COMES NOW the Plaintiff, by and through counsel, and submits the following:

TO: Mr. Nicholas Bragorgos
81 Monroe Ave.
Sixth Floor
Memphis, TN 38103-5402

Pursuant to T.C.A. §24-5-113, Plaintiff hereby gives notice of filing and service of the attached medical bills incurred by the Plaintiff in this cause along with the itemization of said medical bills. The bills are filed and served more than ninety (90) days prior to the date of trial as required, and are entitled to the statutory presumption of reasonableness. Any party desiring to rebut the presumption must serve notice of intent to do so at least forty-five (45) days prior to trial.

RESPECTFULLY SUBMITTED this the 24th day of August, 2007.

BY: /s/ Jason G. Whitworth
JASON G. WHITWORTH, #017615
LAW OFFICE OF JASON G. WHITWORTH
202 S. Cooper Street
Suite 4
Memphis, TN 38104
(901) 729-9999/telephone
(901) 725-6004/facsimile
Attorney for Plaintiffs

NAHON, SAHAROVICH & TROTZ, PLC
DAVID W. HILL
488 South Mendenhall
Memphis, TN 38117
(901) 683-2751/telephone
(901) 462-3350/fax

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been delivered by United States Mail, postage prepaid, this 24th day of August, 2007, to the following:

Mr. Nicholas Bragorgos
81 Monroe Ave.
Sixth Floor
Memphis, TN 38103-5402

/s/ Jason G. Whitworth